

ORIGINAL INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF ITS PLAN FOR STRANDED
COST RECOVERY

Arizona Corporation Commission

DOCKETED
DOCKET NO. E-01345A-98-0473

MAY 28 1999

IN THE MATTER OF THE FILING OF
ARIZONA PUBLIC SERVICE COMPANY OF
UNBUNDLED TARIFFS PURSUANT TO
A.A.C. R14-2-1601 *ET SEQ.*

DOCKETED BY

DOCKET NO. E-01345A-97-0773

IN THE MATTER OF COMPETITION IN THE
PROVISION OF ELECTRIC SERVICES
THROUGHOUT THE STATE OF ARIZONA

DOCKET NO. RE-00000C-94-0165

COMMONWEALTH'S APPLICATION FOR LEAVE TO INTERVENE

Commonwealth Energy Corporation ("Commonwealth"), through undersigned counsel, and pursuant to A.A.C. Rule 14-3-105, moves to intervene in the matter captioned above. In support of this Motion, Commonwealth states as follows:

1. Commonwealth is a California corporation active in the marketing of competitive electric services in California and desires to market competitive electric services in Arizona.

2. Commonwealth has intervened in the Arizona Electric Competition proceeding, Docket No. RE-00000C-94-0165.

3. Commonwealth will be directly and substantially affected by the decisions made in this proceeding because Commonwealth anticipates becoming an electric service provider in Arizona.

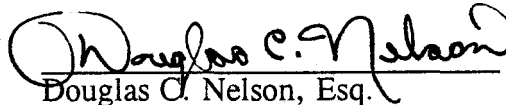
4. Commonwealth has invested considerable time and resources in the development of the California electric marketplace and it desires to sell similar competitive electric services in

1 Arizona. Therefore, Commonwealth has a vested interest as to how electric service providers are
2 treated under the Electric Competition Rules and in the ability of electric service providers to
3 compete in Arizona.

4 For the reasons presented, Commonwealth respectfully requests that this Motion to
5 Intervene be granted.

6 RESPECTFULLY submitted this 28th day of May, 1999.

7 DOUGLAS C. NELSON, P.C.

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9 

10 Douglas C. Nelson, Esq.
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12 Phoenix, Arizona 85020
Attorney on behalf of Commonwealth Energy Corporation

13 **ORIGINAL and ten copies** of the foregoing
14 filed this 28th day of May, 1999 to:

15 Docket Control
16 ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

17 **COPIES** of the foregoing hand-delivered
18 this 28th day of May, 1999 to:

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2 this 28th day of May, 1999 to:

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